

Thomas F. Bertrand, State Bar No. 056560
Richard W. Osman, State Bar No. 167993
BERTRAND, FOX & ELLIOT
The Waterfront Building
2749 Hyde Street
San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990
Attorneys for Defendants
CITY OF NOVATO, CHIEF JOSEPH KREINS,
OFFICER THOMAS MACKENZIE, OFFICER
MICHAEL DUNN and OFFICER STEPHANIE COMMISTO

David L. Fiol, State Bar No. 203546
BRENT, FIOL & NOLAN LLP
Two Embarcadero Center, 18th Floor
San Francisco, California 94111
Telephone: (415) 259-4420
Facsimile: (415) 373-4420
Attorneys for Plaintiffs
LYNNETTE FRARY AND JAMIE BALL

Charles A. Bonner, State Bar No. 85413
A. Cabral Bonner, State Bar No. 247528
BONNER & BONNER
475 Gate Five Rd, Suite 212
Sausalito, CA 94965
Telephone: 415-331-3070
Facsimile: 415-331-2738
Attorneys for Plaintiff
HEATHER HOWARD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LYNNETTE FRARY, et al.,

Plaintiffs,

v.

COUNTY OF MARIN, et al.,

Defendants.

Case No. CV-12-3928 MEJ

**STIPULATED REQUEST TO EXTEND TIME TO
RESPOND TO FIRST AMENDED COMPLAINT;
~~PROPOSED~~ ORDER**

1 The parties in the above-captioned case, by and through their counsel of record, hereby represent
2 to the Court as follows:

3 1. On January 17, 2013, Plaintiffs filed their First Amended Complaint in the above-
4 captioned action.

5 2. Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer
6 Michael Dunn and Officer Stephanie Commisto's last day to file a responsive pleading to the First
7 Amended Complaint is currently January 31, 2013.

8 3. Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer
9 Michael Dunn and Officer Stephanie Commisto intend to file an answer to the First Amended Complaint,
10 but require additional time to prepare the answer. The parties have agreed to a ten (10) day extension of
11 time to answer.

12 4. Plaintiffs and Defendants City of Novato, Chief Joseph Kreins, Officer Thomas
13 Mackenzie, Officer Michael Dunn and Officer Stephanie Commisto stipulate to extend the time for
14 Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer Michael Dunn and
15 Officer Stephanie Commisto to respond to the First Amended Complaint through and including
16 February 11, 2013.

17 Dated: January 31, 2013

BERTRAND, FOX & ELLIOT

18 By: /s/ Richard W. Osman
19 Richard W. Osman
20 Attorneys for Defendants
21 CITY OF NOVATO, CHIEF JOSEPH KREINS,
OFFICER THOMAS MACKENZIE, OFFICER
MICHAEL DUNN and OFFICER STEPHANIE
COMMISTO

22 Dated: January 31, 2013

BRENT, FIOLE & NOLAN LLP

23 By: /s/ David L. Fiol
24 David L. Fiol
25 Attorneys for Plaintiffs
LYNNETTE FRARY AND JAMIE BALL

26 Dated: January 31, 2013

BONNER & BONNER

27 By: /s/ Charles A. Bonner
28 Charles A. Bonner
Attorneys for Plaintiff
HEATHER HOWARD

PROPOSED ORDER

Upon the foregoing Stipulation, and for good cause shown, IT IS ORDERED that the time for Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer Michael Dunn and Officer Stephanie Commisto to respond to the Complaint shall be extended to February 11, 2013.

DATED: January 31, , 2013

